

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOSEPH G. SUSAN, JR.

Plaintiff,

v.

BUCKNELL UNIVERSITY

Defendant.

CIVIL ACTION

NO: 4:20-CV-01451-MWB

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

The parties jointly move the Court to extend the discovery deadline set forth in the Court's Case Management Order dated September 14, 2021 (Doc. 26), which provides that all discovery is to be completed by January 3, 2022, and in support thereof state the following:

1. Plaintiff Joseph G. Susan ("Plaintiff") has brought an action against Bucknell University ("Bucknell"), raising claims for fraudulent misrepresentation and under the Age Discrimination in Employment Act ("ADEA"), 29 U.S.C. § 26, and Bucknell has denied any liability in the matter.

2. The parties have served discovery requests, including notices of deposition, and have begun gathering and producing documents responsive to the opposing party's request for production.

3. Bucknell and Plaintiff have agreed to pursue private mediation in an effort to resolve this matter without the need for further litigation; however, Plaintiff has a number of scheduling conflicts related to the current college football season.

4. Plaintiff has advised that he does not expect to have sufficient availability to schedule a mediation until mid-to-late January 2022.

5. Accordingly, for good cause shown, the parties jointly request that the Scheduling Order be amended to provide for an additional 90 days to conduct a mediation and, if a settlement is not reached, to complete discovery.

6. The parties further request a corresponding adjustment of the other milestone dates set out in the current order.

9. A proposed Amended Case Management Order is submitted contemporaneously herewith setting forth the proposed amended dates.

Date: November 10, 2021

Respectfully submitted,

s/ Richard C. Angino

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CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2021, I caused a copy of the foregoing to be served via the Court's Electronic Case Filing (ECF) system upon the following:

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s/ Adam R. Martin
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